

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

R2 SOLUTIONS LLC,

Plaintiff,

v.

DATABRICKS, INC.,

Defendant.

Civil Action No. 4:23-cv-01147-ALM

**JURY TRIAL DEMANDED**

**DECLARATION OF JESSICA M. KAEMPF IN SUPPORT OF  
DATABRICKS, INC.'S MOTION TO TRANSFER VENUE TO THE  
NORTHERN DISTRICT OF CALIFORNIA PURSUANT TO 28 U.S.C. § 1404(a)**

I, Jessica M. Kaempf, declares as follows:

1. I am an attorney admitted to this Court, and I am an associate of the law firm of Fenwick and West LLP, counsel of record for Defendant Databricks, Inc. (“Databricks”) in this action. I make this declaration in support of Databricks’s Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a).

2. Attached hereto as **Exhibit A** is a true and correct annotated printout of an Internet Archive capture of a Yahoo! Inc. webpage on October 6, 2006, which was obtained from <https://web.archive.org/web/20061006145034/http://docs.yahoo.com:80/info/address/>.

3. Attached hereto as **Exhibit B** is a true and correct annotated copy of the LinkedIn page for Ali Dasdan, which was obtained from <https://www.linkedin.com/in/dasdan/>.

4. Attached hereto as **Exhibit C** is a true and correct annotated copy of the LinkedIn page for Ruey-Lung Hsiao, which was obtained from <https://www.linkedin.com/in/ruey-lung-hsiao-5a85a06/>.

5. Attached hereto as **Exhibit D** is a true and correct annotated copy of the LinkedIn page for Hung-chih Yang, which was obtained from <https://www.linkedin.com/in/hung-chih-yang-4a8a647/>.

6. Attached hereto as **Exhibit E** is a true and correct annotated copy of the assignment history of the ’610 patent, which was obtained from <https://patentcenter.uspto.gov/applications/11539090/assignments?application=>.

7. Attached hereto as **Exhibit F** is a true and correct annotated copy of Exhibit 10 to the Declaration of Eric Lucas dated May 19, 2021 filed in the case, *R2 Solutions LLC v. Target Corp.*, Case No. 4:21-cv-00092-ALM (E.D. Tex.).

8. Attached hereto as **Exhibit G** is a true and correct annotated copy of the LinkedIn page for Eric Lucas, which was obtained from <https://www.linkedin.com/in/eric-lucas-29a0232a>.

9. Attached hereto as **Exhibit H** is a true and correct annotated copy of the LinkedIn page for Jeffrey Dean, one of the creators of MapReduce, which was obtained from <https://www.linkedin.com/in/jeff-dean-8b212555/>.

10. Attached hereto as **Exhibit I** is a true and correct, annotated and excerpted copy of the Accurant report for Sanjay Ghemawat.

11. Attached hereto as **Exhibit J** is a true and correct copy of the U.S. Patent No. 7,590,620.

12. Attached hereto as **Exhibit K** is a true and correct copy of the US Patent Publication No. 2006/0218123.

13. Attached hereto as **Exhibit L** is a true and correct copy of the U.S. Patent No. 6,343,295.

14. Attached hereto as **Exhibit M** is a true and correct, annotated and excerpted copy of the Accurant report for Robert Charles Pike.

15. Attached hereto as **Exhibit N** is a true and correct annotated copy of the LinkedIn page for Sean Quinlan, which was obtained from <https://www.linkedin.com/in/sean-quinlan-8051a3/>.

16. Attached hereto as **Exhibit O** is a true and correct copy of the LinkedIn page for Sudipto Chowdhuri, which was obtained from <https://www.linkedin.com/in/sudipto-chowdhuri-b00b9021/>.

17. Attached hereto as **Exhibit P** is a true and correct annotated copy of the LinkedIn page for Casey L. Kiernan, which was obtained from <https://www.linkedin.com/in/caseykiernan/details/experience/>.

18. Attached here to as **Exhibit Q** is a true and correct annotated copy of the Certificate of Amendment filed by R2 with the Secretary of State for the State of Texas.

19. Attached hereto as **Exhibit R** is a true and correct annotated copy of the LinkedIn page for Marc Booth, a signatory of R2's filings to the Texas Secretary of State.

20. Attached hereto as **Exhibit S** is a true and correct annotated copy of the LinkedIn page for Acacia Research Group LLC, which was obtained from <https://www.linkedin.com/company/acacia-research-group-llc/people/>.

21. Attached hereto as **Exhibit T** is a true and correct annotated copy of Acacia Research Corporation's "contact us" webpage, which is available at <https://www.acaciaresearch.com/#ContactUs>.

22. Attached hereto as **Exhibit U** is a true and correct annotated copy of the management list for Acacia Research Group LLC downloaded from the Texas Secretary of State website.

23. Attached hereto as **Exhibit V** is a true and correct annotated copy of a Google Maps image showing the distance from Databricks' headquarters to the Eastern District of Texas, Sherman Division.

24. Attached hereto as **Exhibit W** is a true and correct copy of a Google Maps image showing the distance from Laguna Beach, California to Sherman, Texas.


25. Attached hereto as **Exhibit X** is a true and correct copy of a Google Maps image showing the distance from Laguna Beach, California to San Francisco, California.

26. Attached hereto as **Exhibit Y** is a true and correct annotated and excerpted copy of the Accurint report for Sean M. Dorward.

27. Attached hereto as **Exhibit Z** is a true and correct annotated copy of the LinkedIn page for Steward P. MacLeod, which was obtained from <https://www.linkedin.com/in/directorsoftwaredevelopment/>.

28. Attached hereto as **Exhibit AA** is a true and correct copy of the LinkedIn page for Vij Rajaraian, which was obtained from <https://www.linkedin.com/in/vijrajarajan/>.

I declare under penalty of perjury under the laws of the United States of America that, to the best of my belief, the foregoing is true and correct, and that this Declaration was executed on May 21, 2024.

  
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Jessica M. Kaempf

**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on May 21, 2024. Additionally, I hereby certify that all counsel of record who consented to electronic service are being served with a copy of this document via electronic mail per Local Rule CV-5.

/s/ Michael J. Sacksteder

Michael J. Sacksteder